



**From:** [Paterno Law Firm](#)  
**To:** [Jeff Rosin](#)  
**Cc:** [Lisbeth Valdez](#); [Kathryn Vassall](#); [Jay M. Wolman](#)  
**Subject:** Re: [EXTERNAL] Re: Rooterman v Belegu - Waiver of Service (Civil Action No. 1:24-cv-13015) [IMAN-ACTIVE.FID529980]  
**Date:** Thursday, June 5, 2025 5:19:45 PM  
**Attachments:** [image001.png](#)

---

**CAUTION:** This email originated from outside the organization.  
Do not click links or open attachments unless you are expecting them from the sender.

Dear Jeff, I am not retaining outside counsel since I am simply going to file a Motion to dismiss focusing on constitutional due process standards, Massachusetts long-arm statute, and relevant case law to argue that Massachusetts courts lack both general and specific jurisdiction over these defendants.

Best regards

Sandro S. Paterno, Esq.  
Paterno' & Associates P.C.  
11 Broadway, Suite 865  
New York, NY 10004  
Tel: [212 732 2006](tel:2127322006)  
[info@paternoandassociates.com](mailto:info@paternoandassociates.com)

1049 Church Road  
Toms River, NJ 08755  
Tel. 551 580 9751

Rome Office  
Viale Liegi 16  
00198 Roma  
Tel +39 06 80690945

On Thu, Jun 5, 2025 at 4:53 PM Jeff Rosin <[jrosin@ohaganmeyer.com](mailto:jrosin@ohaganmeyer.com)> wrote:

Mr. Paterno - thank you. Please be advised that as more recently explained in Dickey v. Inspectional Services Dept. of Boston, 482 Mass. 1003 (2019), it has long been the law in Massachusetts corporations must appear in the Massachusetts courts through counsel. Thus, please have a look at that case, and let us know your response.

Jeff

---

**From:** Paterno Law Firm <[info@paternoandassociates.com](mailto:info@paternoandassociates.com)>  
**Sent:** Thursday, June 5, 2025 4:47 PM

**To:** Lisbeth Valdez <[lvaldez@ohaganmeyer.com](mailto:lvaldez@ohaganmeyer.com)>

**Cc:** Jeff Rosin <[jrosin@ohaganmeyer.com](mailto:jrosin@ohaganmeyer.com)>; Kathryn Vassall <[kvassall@ohaganmeyer.com](mailto:kvassall@ohaganmeyer.com)>; Jay M. Wolman <[jmw@randazza.com](mailto:jmw@randazza.com)>

**Subject:** [EXTERNAL] Re: Rooterman v Belegu - Waiver of Service (Civil Action No. 1:24-cv-13015) [IMAN-ACTIVE.FID529980]

**CAUTION:** This email originated from outside the organization.  
Do not click links or open attachments unless you are expecting them from the sender.

Dear Ms. Valdez,

Please find attached three signed waivers of service of summons.

I would like to inform you that I have not retained outside counsel and will be appearing pro se, as well as on behalf of Paterno & Associates P.C. and 911 Plumbing & Restoration Inc.

Sincerely,

Sandro S. Paterno, Esq.

Paterno' & Associates P.C.  
11 Broadway, Suite 865  
New York, NY 10004  
Tel: [212 732 2006](tel:2127322006)

[info@paternoandassociates.com](mailto:info@paternoandassociates.com)

1049 Church Road

Toms River, NJ 08755

Tel. 551 580 9751

Rome Office

Viale Liegi 16

00198 Roma

Tel +39 06 80690945

On Thu, Jun 5, 2025 at 3:58 PM Lisbeth Valdez <[lvaldez@ohaganmeyer.com](mailto:lvaldez@ohaganmeyer.com)> wrote:

Mr. Paterno,

We have not yet heard back from you regarding this request. Please let us know of your response soon, otherwise we will have to begin effectuating service.

Have you obtained outside counsel yet? If so, please forward us their contact information.

Thank you,

Lisbeth

**Lisbeth Valdez**

Associate

140 Kendrick Street, Building C, 2<sup>nd</sup> Floor

Needham, MA 02494

PH 617.843.6800 | DIR 617.843-6819 | C 315.737.3007



California ▲ Colorado ▲ Delaware ▲ District of Columbia ▲ Georgia ▲ Illinois  
Maryland ▲ Massachusetts ▲ Michigan ▲ Nevada ▲ New Jersey ▲ New York  
North Carolina ▲ Oregon ▲ Pennsylvania ▲ Virginia ▲ Washington

**Mansfield Rule**  
Certified 2023

[OHaganMeyer.com](http://OHaganMeyer.com)

**From:** Lisbeth Valdez

**Sent:** Monday, June 2, 2025 2:09 PM

**To:** Paterno Law Firm <[info@paternoandassociates.com](mailto:info@paternoandassociates.com)>

**Cc:** Jeff Rosin <[jrosin@ohaganmeyer.com](mailto:jrosin@ohaganmeyer.com)>; Kathryn Vassall <[kvassall@ohaganmeyer.com](mailto:kvassall@ohaganmeyer.com)>

**Subject:** Rooterman v Belegu - Waiver of Service (Civil Action No. 1:24-cv-13015) [IMAN-ACTIVE.FID529980]

Dear Mr. Paterno,

We are writing to formally request that you waive service of summons on behalf of Defendants Sandro Paterno, Paterno & Associates P.C., and 911 Plumbing & Restoration in the above-referenced case. We are attaching a copy of the Amended Complaint, filed May 28, 2025, as well as a copy of the Waiver of Service of Summons for all defendants to this email. An additional courtesy copy of each is attached, per Rule 4.

Please note that this is not formal service of the summons on you, but rather a request that you sign and return the enclosed waiver of service for all defendants.

If you agree to accept service and this waiver, please return a signed form on behalf of each defendant via e-mail. If you comply with this request and return the signed waiver, it will be filed with the court and no summons will be served. The action will then proceed as if Defendants had been served on the date the waiver is signed, except that Defendants will be obligated to answer the complaint within 60 days from the date designated below as the date on which this request is sent.

If you do not agree to accept service, and return the signed waiver forms and cooperate in saving unnecessary expenses of serving a summons and complaint, we will arrange to have the summons and complaint served on all defendants and ask the court to require you to pay the full costs of such service, pursuant to Rule 4 of the Federal Rules of Civil Procedure.

Please review and return a signed copy of each form to us by July 2, 2025.

Thank you,

Lisbeth

**Lisbeth Valdez**

Associate

140 Kendrick Street, Building C, 2<sup>nd</sup> Floor

Needham, MA 02494

PH 617.843.6800 | DIR 617.843-6819 | C 315.737.3007

**O'HAGAN MEYER**

ATTORNEYS ▲ ADVISORS

California ▲ Colorado ▲ Delaware ▲ District of Columbia ▲ Georgia ▲ Illinois  
Maryland ▲ Massachusetts ▲ Michigan ▲ Nevada ▲ New Jersey ▲ New York  
North Carolina ▲ Oregon ▲ Pennsylvania ▲ Virginia ▲ Washington

**Mansfield Rule<sup>™</sup>**  
Certified 2023

[OHaganMeyer.com](http://OHaganMeyer.com)